

Exhibit A

VESTA CORPORATION vs. VESTA MANAGEMENT SERVICES, LLC

10/08/2015

Joshua Greenblatt

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

VESTA CORPORATION,	:	
	:	
Plaintiff	:	CIVIL ACTION NO.
	:	4:15-CV-00719
vs.	:	
	:	
VESTA MANAGEMENT SERVICES, LLC.	:	
	:	
Defendant	:	

DEPOSITION OF:	JOSHUA GREENBLATT
DATE:	OCTOBER 8, 2015
HELD AT:	UPDIKE, KELLY & SPELLACY, P.C. 100 PEARL STREET HARTFORD, CT

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Reporter: Tiffany V. Pratt, LSR #00128

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1 around McAllen. Is that sort of an accurate summary?

2 A That is an accurate summary.

3 Q So I'd like to shift focus a little bit and talk
4 more about what Vesta Corporation does, for lack of a
5 better word. So how would you describe Vesta
6 Corporation's scope of services?

7 A We are a fully integrated affordable housing
8 company.

9 Q All right. So what does fully integrated
10 mean?

11 A We develop, own and manage affordable
12 properties.

13 Q Now, I noticed that the "affordable properties"
14 is a term that you all use on your website as well. So
15 what is an affordable property?

16 A An affordable property is a property in
17 which -- in which the property rents to households who
18 make less than 100 percent of AMI.

19 Q All right. So you said that you all develop,
20 own and manage properties; is that correct?

21 A Correct.

22 Q So within the development portion of you all's
23 services, who exactly are your consumers? Who are the
24 people that you're selling the product or the services
25 that Vesta Corporation has to offer? Who are you selling

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1 Q Were the investors' offices renting apartments
2 from Vesta Corporation in Texas?

3 A No.

4 Q And were they managing properties for Vesta
5 Corporation in Texas?

6 A No.

7 Q I actually asked that backwards. Were they
8 asking Vesta Corporation to manage properties?

9 A No.

10 Q Did Vesta Corporation target consumers in Texas
11 between the years of 2006 to 2014?

12 MR. MARKS: Objection, vague as to
13 target.

14 MS. MENAGE: I'll rephrase.

15 BY MS. MENAGE:

16 Q Did Vesta Corporation advertise any properties
17 in Texas between the years 2006 and 2014?

18 A Not to my knowledge.

19 Q Kind of final wrap-up questions here. The first
20 one is: If you know, what's the meaning of the word
21 Vesta?

22 A I believe it is the Roman goddess of hearth and
23 home.

24 Q Have you ever heard the name Vesta or the word
25 Vesta associated with any other property-related

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1 C E R T I F I C A T I O N

2 STATE OF CONNECTICUT:
3 COUNTY OF HARTFORD:

4 I, TIFFANY V. PRATT, a Notary Public duly
5 commissioned and qualified in and for the State of
6 Connecticut, do hereby certify that pursuant to Notice
7 there came before me on the 8th of October, 2015, the
8 following named person, to wit: OCTOBER 8, 2015, who was
9 previously duly sworn to testify to the truth and nothing
10 but the truth; that he was thereupon examined upon his
11 oath; that the examination was reduced to writing by
12 computer under my supervision and that this transcript is
13 a true record of the testimony given by said witness.

14 I further certify that I am neither attorney nor
15 counsel for, nor related to, nor employed by any of the
16 parties to the action in which this deposition was taken,
17 and further, that I am not a relative or employee of any
18 attorney or counsel employed by the parties hereto, or
19 financially interested in the outcome of this action.

20 In witness whereof I have hereunto set my hand
21 this 13th day of October, 2015.

22 

23 _____
24 Tiffany V. Pratt
25 Notary Public

26 My Commission expires
27 July 31, 2020